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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re
CASH CLOUD, INC. dba COIN CLOUD,

Debtor.

Case No.: 23-10423-mkn
Chapter 11

**STIPULATION EXTENDING THE
CHALLENGE PERIOD SET FORTH
IN THE FINAL DIP ORDER**

This stipulation (this “Stipulation”) is entered into as of June 29, 2023, by and among
(i) Cash Cloud, Inc. dba Coin Cloud, the debtor and debtor in possession (the “Debtor”) in the above-

captioned chapter 11 case (the “Chapter 11 Case”), (ii) the Official Committee of Unsecured Creditors (the “Committee”), and (iii) Enigma Securities Limited (“Enigma,” and, together with the Debtor and the Committee, collectively, the “Parties”), to extend the Committee’s “Challenge Period” (as such term is defined in the *Final Order Under Bankruptcy Code Sections 105, 361, 362, 363, 364(c)(1), 364(c)(3), 364(d)(1) and 364(e) and Bankruptcy Rules 2002, 4001, 6004 and 9014 Authorizing Debtor to (A) Obtain Postpetition Financing and (B) Grant Adequate Protection* [ECF No. 318] (the “Final DIP Order”)),¹ and the Parties stipulate and agree as follows:

RECITALS

This Stipulation is entered into with reference to the following recitals:

WHEREAS, on February 7, 2023, the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code in this Court;

WHEREAS, on February 17, 2023, the Office of the United States Trustee filed a notice of appointment of the Committee [ECF No. 131], as amended on February 28, 2023 [ECF No. 177];

WHEREAS, on March 20, 2023, the Court entered the Final DIP Order, which provided for a Challenge Period for the Committee of sixty (60) calendar days from appointment of the Committee, resulting in a Challenge Period Termination Date of April 18, 2023;

WHEREAS, the Parties desire to enter into this Stipulation on the terms and conditions set forth herein; and

WHEREAS, the undersigned hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective Parties and that the respective Parties have full knowledge of, and have consented to, this Stipulation.

STIPULATION

1. The Challenge Period set forth in Paragraph 17(b) of the Final DIP Order applicable to the Committee shall be extended through and including July 7, 2023, provided that if the Committee delivers a settlement proposal to Enigma on or before such date, the Challenge Period

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Final DIP Order.

1 shall be automatically extended until July 14, 2023 (the “Committee Challenge Period Extension
 2 Date”) solely with respect to those challenges to the validity, perfection and priority of the Enigma
 3 Liens that were specifically identified by counsel to the Committee in writing to counsel to Enigma
 4 on April 14, 2023 (the “Disclosed Challenges”), for which challenges the term Committee Challenge
 5 Period Extension Date shall replace the term Challenge Period under the Final DIP Order for all
 6 purposes. For the avoidance of doubt, this Stipulation does not extend the Committee’s Challenge
 7 Period for potential challenges, claims and allegations that are not Disclosed Challenges. Potential
 8 claims or allegations subject to the Challenge Period that are not Disclosed Challenges shall be
 9 treated in accordance with and pursuant to Paragraph 17 of the Final DIP Order.

10 2. Nothing herein shall limit the Committee’s right to seek to extend further the
 11 Committee Challenge Period Extension Date with respect to the Disclosed Challenges for cause in
 12 accordance with the Bankruptcy Code.

13 3. For the avoidance of doubt, this Stipulation shall not impact in any way the expiration
 14 of the Challenge Period with respect to any parties, matters, issues, or items other than with respect
 15 to those specifically addressed herein.

16 4. Except as expressly set forth in this Stipulation, all provisions of the Final DIP Order
 17 (as amended by subsequent orders of the Court from time to time) remain in full force and effect
 18 and are not modified by this Stipulation in any way. For the avoidance of doubt, nothing herein
 19 shall be deemed to extend or change the Challenge Period set forth in the Final DIP Order with
 20 respect to any party in interest other than the Committee.

21 5. This Court shall retain jurisdiction with respect to all matters arising from or related
 22 to this Stipulation.

23 6. This Stipulation may be executed in counterparts, each of which constitutes an
 24 original, and all of which, collectively, constitute only one agreement.

IT IS SO STIPULATED BY:

Dated June 29, 2023.

Dated June 29, 2023.

FOX ROTHSCHILD LLP

McDONALD CARANO LLP

/s/ Brett A. Axelrod

/s/ Ryan J. Works

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1 Dated June 29, 2023.

2 MORRISON & FOERSTER LLP

3 /s/ Andrew Kissner

4 Gary Lee, Esq.

5 Andrew Kissner, Esq.

6 *(pro hac vice applications granted)*

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